STANFORD, CLAUDIA
PAGE 1 OF 1

Hello, my name is Claudia Stanford. I live in Amarillo, Texas and I heard on the news that we could comment at this number about our feelings on the possible ability of a plutonium pit disassembly plant being located here at Pantex. And I just wanted to express my feelings that I'm opposed to this and hope that this is placed somewhere else and feel as though it poses too much a threat to the Ogalala Aquifer. And just appreciate the opportunity to be able to express my feelings to you. 1

PD018

PD018–1 **Alternatives**

DOE acknowledges the commentor's opposition to siting the pit conversion facility at Pantex. Section 4.26.3.2 analyzes impacts to the environment (including contamination to the Ogallala aquifer) due to construction and normal operation of a pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based upon environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

Jim Steiert
Box 95
Hereford, TX 79045

August 19, 1998

U. S. Department of Energy
Office of Fissile Materials Disposition
P.O. Box 23786
Washington, DC, 20026-3786

To the DOE:

I **OPPOSE** plutonium pit disassembly and conversion at the Pantex Plant at Amarillo. Undemonstrated and unproven technologies are proposed for use. Plutonium at Pantex imperils the precious Ogallala aquifer. Further processing of plutonium at Pantex presents an even greater hazard to groundwater and residents. 1

Pantex has already polluted its site with high explosives in a perched aquifer lying above the Ogallala, not only soiling its property, but adjacent private land as well. 2

Routine emissions of tritium, plutonium, americium, and other deadly compounds can be expected from the smokestacks of any plutonium processing facility at Pantex. Pit disassembly and conversion at Pantex would create unacceptable new hazards.

Pantex has never processed plutonium, and it doesn't have any business starting now. Your own agency's cost estimates place the taxpayer expense of locating plutonium processing at Pantex at $60 million or more.

Despite promises, safety conditions at the Pantex plant haven't improved. Up to 20,000 plutonium pits are heating-up the old bunkers at Pantex. Both the U.S. Government Accounting Office and the Defense Nuclear Facilities Safety Board have been critical of plutonium storage safety at Pantex. Your agency promised that aging munitions bunkers at Pantex were for "temporary" storage of plutonium pits, yet the pits still remain crammed in these aging bunkers in unsuitable storage containers, potentially in an unstable environment. Many of these bunkers began heating-up immediately after pits went into them. Only about three bunkers even have air conditioning. How long is this "temporary" storage going to continue before some disaster occurs? 1

Pantex has neither the size, the equipment, nor the expertise to handle processing of plutonium. We don't need the radioactive contamination in the Texas Panhandle that your agency's presence and activities have already "gifted" Rocky Flats, Colorado, and Hanford, Washington with. **Keep plutonium pit processing OUT of Pantex!**

Thank you for the opportunity to comment.

Sincerely,

Jim Steiert

Jim Steiert
Box 95
Hereford, Texas 79045

MD083

MD083–1 **Alternatives**

DOE acknowledges the commentor's opposition to siting the pit conversion facility at Pantex. It is true that this would be the first consolidated facility for accomplishing surplus plutonium disposition on a large scale. However, the processes are not entirely new; many are in use at LANL and LLNL. DOE has recently started a pit disassembly and conversion demonstration project at LANL, where the processes will be further tested and additional data pertinent to future operations developed. As shown in Section 2.18, Table 2–4 includes a summary of the environmental impacts by alternative. Alternative 5 shows that the impacts associated with operating the pit conversion facility at Pantex would likely be minor. The estimated dose to the public from radiological emissions (e.g., americium, tritium, and plutonium) would be 0.58 person-rem/yr, which would result in an increase of 2.9×10^{-3} LCFs over the 10-year operating life of the facility.

DOE acknowledges the commentor's concern regarding the storage of plutonium pits at Pantex. DOE is committed to the safe, secure storage of pits and is evaluating options for upgrades to Pantex Zone 4 facilities to address plutonium storage requirements. DOE has addressed some of the commentor's concerns in an environmental review concerning the repackaging of Pantex pits into a more robust container. This evaluation is documented in the *Supplement Analysis for: Final Environmental Impact Statement for the Continued Operation of the Pantex Plant and Associated Storage of Nuclear Weapon Components—AL–R8 Sealed Insert Container* (August 1998). This document is on the MD Web site at http://www.doe-md.com. Based on this supplement analysis, the decision was made to repackage pits at Pantex into the AL–R8 sealed insert container and to discontinue plans to repackage pits into the AT–400A container.

Worker exposure estimates attributable to the decision to repackage pits in AL–R8 sealed insert containers were incorporated in the revised Section 2.18 and Appendix L.5.1.

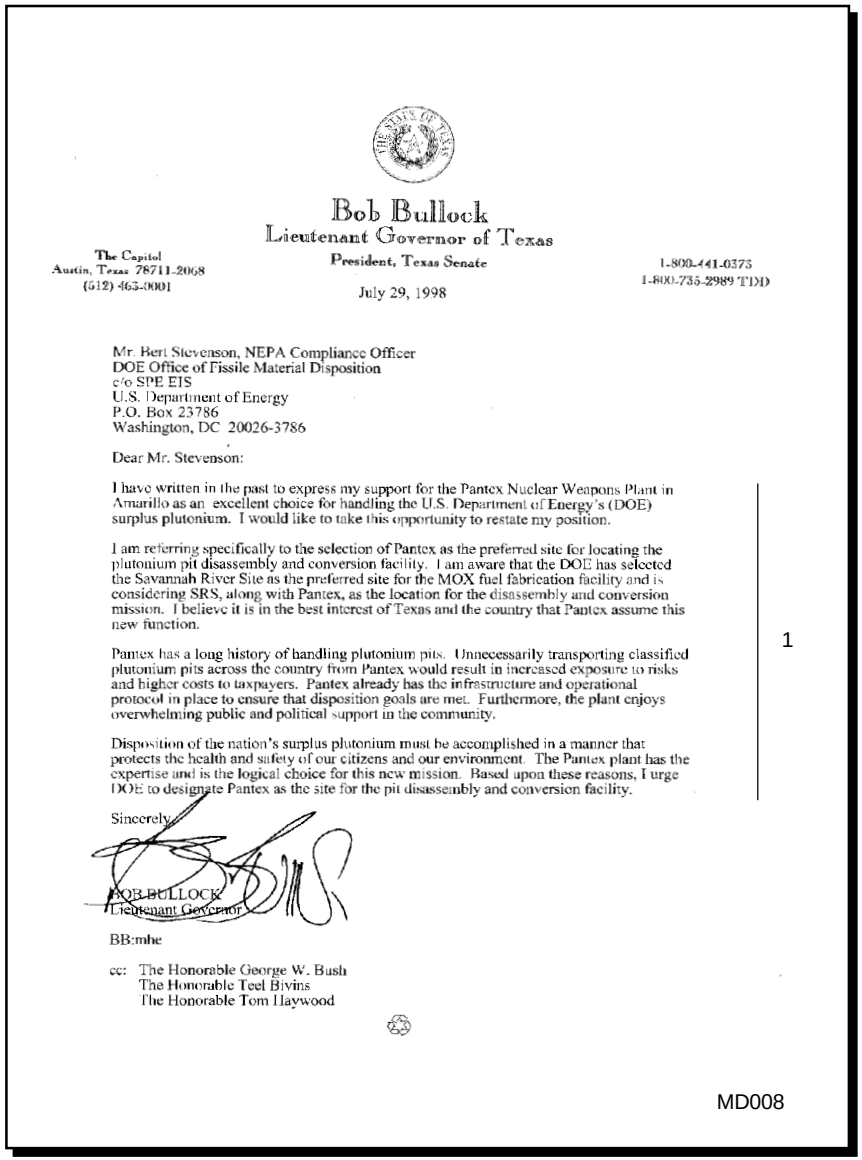
The issues raised in this comment relate to pit storage decisions made in the *Storage and Disposition PEIS* and the *Final Environmental Impact Statement for the Continued Operation of the Pantex Plant and*

Associated Storage of Nuclear Weapon Components (DOE/EIS-0225, November 1996). DOE is considering leaving the repackaged surplus pits in Zone 4 at Pantex for long-term storage. An appropriate environmental review will be conducted when the specific proposal for this change has been developed; addressing, for example, whether additional magazines need to be air-conditioned. The analysis in this SPD EIS assumes that the surplus pits are stored in Zone 12 in accordance with the ROD for the *Storage and Disposition PEIS*.

MD083–2 **Water Resources**

Analyses presented in Sections 2.18 and 4.26.3.2.2, respectively, indicate that there would be no discernible impacts on water quality or to the human health of nearby residents from normal operation of the proposed surplus plutonium disposition facilities at Pantex.

TEXAS, LIEUTENANT GOVERNOR
HONORABLE BOB BULLOCK
PAGE 1 OF 1



Bob Bullock
Lieutenant Governor of Texas
President, Texas Senate

The Capitol
Austin, Texas 78711-2068
(512) 463-0001

1-800-441-0375
1-800-735-2989 TDD

July 29, 1998

Mr. Bert Stevenson, NEPA Compliance Officer
DOE Office of Fissile Material Disposition
c/o SPE EIS
U.S. Department of Energy
P.O. Box 23786
Washington, DC 20026-3786

Dear Mr. Stevenson:

I have written in the past to express my support for the Pantex Nuclear Weapons Plant in Amarillo as an excellent choice for handling the U.S. Department of Energy's (DOE) surplus plutonium. I would like to take this opportunity to restate my position.

I am referring specifically to the selection of Pantex as the preferred site for locating the plutonium pit disassembly and conversion facility. I am aware that the DOE has selected the Savannah River Site as the preferred site for the MOX fuel fabrication facility and is considering SRS, along with Pantex, as the location for the disassembly and conversion mission. I believe it is in the best interest of Texas and the country that Pantex assume this new function.

Pantex has a long history of handling plutonium pits. Unnecessarily transporting classified plutonium pits across the country from Pantex would result in increased exposure to risks and higher costs to taxpayers. Pantex already has the infrastructure and operational protocol in place to ensure that disposition goals are met. Furthermore, the plant enjoys overwhelming public and political support in the community.

Disposition of the nation's surplus plutonium must be accomplished in a manner that protects the health and safety of our citizens and our environment. The Pantex plant has the expertise and is the logical choice for this new mission. Based upon these reasons, I urge DOE to designate Pantex as the site for the pit disassembly and conversion facility.

Sincerely,

BOB BULLOCK
Lieutenant Governor

BB:mhe

cc: The Honorable George W. Bush
The Honorable Teel Bivins
The Honorable Tom Haywood

1

MD008

MD008–1 **Alternatives**

DOE acknowledges the Lieutenant Governor's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

TEXAS A&M UNIVERSITY
JOHN M. SWEETEN
PAGE 1 OF 5

JMS/August 11, 1998

REVIEW COMMENTS
SURPLUS PLUTONIUM DISPOSITION
DRAFT ENVIRONMENTAL IMPACT STATEMENT, July, 1998

At the request of the Amarillo National Resource Center for Plutonium, a consortium of the Texas A & M University System, the University of Texas System, and Texas Tech University, I have reviewed the 4-part document "Surplus Plutonium Disposition Draft Environmental Impact Statement: Summary, Volume I-Part A, Volume I-Part B, and Volume II", U. S. Department of Energy, Washington, D. C., July, 1998.1,500 p. While my review of the Surplus Plutonium Disposition (SPD) Environmental Impact Statement (EIS) was focused on those parts relating specifically to the Pantex Plant and to the environmental quality assessment and impact considerations, a general review was given also to other locations under consideration.

The analysis of the 23 alternatives articulated and presented for review was thorough and balanced with respect to the various sites under consideration. I understand that some of these alternatives are no longer under consideration subsequent to a DOE recent decision to locate the fuel rod assembly fabrication process using plutonium oxide at Savannah River Site (SRS) which is the point of proposed final utilization in an existing nuclear power plant. This decision constrains the selection of alternatives involving Pantex to only those involving (a) current mission of long-term plutonium pit storage with upgrades, (b) pit disassembly, and (c) pit conversion of Pu into plutonium dioxide, a component along with uranium dioxide of eventual Mixed Oxide (MOx) fuel rods fabricated at SRS. In essence the remaining alternatives involving Pantex are as follows (n=8): Alternatives 1, 4A, 4B, 5A, 5B, 11B, 12C, and 12D . 1

I do not view Alternative 1 (No Action) as a viable option, in that the estimated half-life of plutonium in its present form is some 24,000 years. This is a long time for governments, militaries and taxpayers to guard and protect from terrorism, accident, environmental and natural resource damage, and human tragedy some 50 metric tons of active fissile material that has commercial value as well as obvious destructive potential. This potential "legacy" should not be left for future generations of Texans and other Americans. The 1:1 leveraging opportunities with the former Soviets with respect to their disassembled and stored fissile materials would be lost as well. The other 22 alternatives would put all this behind us by the year 2015, or with typical public works delays by the year 2020-2025 at least. The Panhandle, Texas, America and the world then will be a safer place. 2

So the question really becomes two-fold:
(a) is the presently-proposed suite of technologies adequate to perform the plutonium handling and conversion safely and effectively; and
(b) is it environmentally secure.
I will defer the former question to the involved experts in nuclear engineering, nuclear physics, chemical engineering, occupational health and safety, and other relevant fields. 3
Regarding the second question, my involvement over the last 18 months with ANRCP technical

TXD49

TXD49–1 **Alternatives**

DOE presented its preferred alternative for siting the immobilization and MOX facilities in the SPD Draft EIS. However, these are only preferences, not decisions. The only alternatives that have been eliminated at this time are those in which the immobilization facility was proposed for Building 221–F at SRS. It was determined that the amount of space required for the immobilization facility would be significantly larger than originally planned. These new space requirements mean that the annex in Building 221–F would be similar in size and environmental impacts to a new immobilization facility at SRS. Therefore, this SPD EIS only presents the alternatives involving a completely new immobilization facility at SRS. DOE will announce its decision regarding facility siting in the SPD EIS ROD.

TXD49–2 **Alternatives**

DOE acknowledges the commentor's opposition to the No Action Alternative, analysis of which is required under NEPA. Section 2.5 indicates that the No Action Alternative would not satisfy the purpose and need for the proposed action because DOE's disposition decisions in the *Storage and Disposition PEIS* ROD would not be implemented. As indicated in Section 1.6, DOE has identified as its preferred alternative the hybrid approach. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

TXD49–3 **Human Health Risk**

DOE acknowledges the commentor's conclusion that the surplus plutonium disposition activities could be conducted in an environmentally secure manner.

TEXAS A&M UNIVERSITY
JOHN M. SWEETEN
PAGE 2 OF 5

staff and a team of experts evaluating and providing risk assessment for the Pu/MOx fuel conversion process, together with my reading of the SPD EIS document itself suggests that, with the data presented so far, the remaining alternatives involving Pantex can be carried out in an environmental secure manner. The probabilities, exposure, and health effect numbers are very, very small. The land area that would be affected by worst-case scenarios involving release of Pu to the environment are very small, contained within site boundaries, and off-site impacts would be practically negligible. 3

Nevertheless, there is necessary and continuing involvement by agricultural scientists and engineers with the agencies affiliated with the Cooperative Research, Education, and Extension Triangle for the Panhandle (Texas Agricultural Experiment Station, Texas Agricultural Extension Service, West Texas A & M University, USDA-Agricultural Research Service, and Texas Veterinary Medical Diagnostic Laboratory), joined by our colleagues at TAMU-College Station and at the TAES Blacklands Research Center at Temple, in providing new data, information, questions, answers and dialogue from the perspective of agricultural production and processing, including soil/water/plant/animal/wildlife relationships. We are interested as well in impacts on water, soil and air resources from the perspective of rural residents and communities. Our concerns with maintaining the viability of crop, feedlot, range and pasture production systems as part of the human food chain, and of those who operate them, is paramount. The recent, current and future scientific projects with ANRCP sponsorship and involvement reflect those concerns and provide answers that should be taken into account with regard to the present SPD EIS and future plant design and operations. We are available for continuing dialogue and partnerships involving scientific discovery, interpretation, exchange, and education in these areas. 4

In terms of the EIS document itself, my remarks will be restricted to only a few areas at this time.

* **Summary, Section S.5**--Topics analyzed in the SPD EIS are appropriate: air quality, noise, waste management, socioeconomics, human health risk, facility accidents, transportation, environmental justice, geology and soils, water resources, ecological resources, cultural and paleontological resources, land use and visual resources, and infrastructure. However, agricultural production systems are not addressed for any of the potential sites, all of which sit in or adjacent to extensive crop and livestock production appropriate to the regions. 5

* **Chapter 2. Alternatives for Disposition of Surplus Weapons-Usable Plutonium--**
  - Page 2-3-- As noted above, several of these alternatives can be eliminated with recent decisions regarding the SRS mission, namely Alternatives 2, 4A, 4B, 6A, 6B, 6C, 6D, 7A, 7B, 8, 9A, 9B, and 10. 6
  - Pages 2-4 to 2-7--From the maps, every site except Pantex has at least one river running through or adjacent to it. 7

* **Chapter 3. Affected Environment--**
  - Section 3.1, Approach to Defining the Affected Environment--the Region of Interest (ROI) did not directly include agricultural resources or producitn practices for any of the candidate sites. If environmental damage were to occur despite safeguards, the public would be 8

TXD49

TXD49–4 **General SPD EIS and NEPA Process**

DOE acknowledges and appreciates the commentor's offer.

TXD49–5 **Socioeconomics**

Appendix J discusses food production analyses for potential radiological doses in counties near each of the candidate sites. Doses received via the ingestion pathways were then used in the dose assessment to the population at each specific site. The potential impacts on prime farmlands are evaluated in the Geology and Soils discussions in Chapter 4 of Volume I. According to the environmental analysis presented in this SPD EIS, neither construction nor normal operation of the proposed facilities should have an impact on the agricultural economy surrounding the candidate sites.

TXD49–6 **Alternatives**

The alternatives cited by the commentor cannot be removed as reasonable alternatives from this SPD EIS because DOE has not yet decided on an alternative for the disposition of surplus plutonium.

The remainder of this comment is addressed in response TXD49–1.

TXD49–7 **Water Resources**

As described in Section 3.4.7.1.1, no streams or rivers flow through Pantex although a number of playas at Pantex hold water after precipitation events. The closest river is the Canadian River 27 km (17 mi) north of Pantex. Although other sites have rivers running through or near them, the analyses presented in Section 4.26 indicate that there would be no discernible impact on surface waters.

TXD49–8 **Socioeconomics**

Appendixes J.1.1.3, J.2.1.3, J.3.1.3, and J.4.1.3 discuss incident-free (normal) releases of radioactivity from the proposed surplus plutonium disposition facilities to the food production chain for each of the candidate sites. The food grid was used in the assessment of doses to the population of each candidate site via the ingestion pathway. However, surplus plutonium disposition activities would be limited to each candidate site boundary and

TEXAS A&M UNIVERSITY
JOHN M. SWEETEN
PAGE 3 OF 5

very interested in food supply and food chain safety issues, and farmers/livestock producers would be directly affected in terms of restrictions on future production practices or marketing opportunities. These are an important considerations. 8

- **Section 3.4, Pantex Plant, Pages 3-88 to 3-124**--the extensive agricultural production practices and programs within a 9-county area around Pantex nor adjacent to the site were not discussed or data listed. This information was provided to the ANRCP in January 1998 in a contract project final report and needs to be presented or summarized herein. The agricultural data should include: crops (types and acreage), soil management practices, livestock grazing (rangelands and wheat pasture), cattle feedlots including sources of feedstuff supplies , beef slaughtering and processing facilities, and grain storage. Dairies, horses swine, poultry, and other species of relevance are not identified as well. Potential secondary pathways of possible contamination--e.g. nonpoint source runoff, wind erosion, water erosion, etc.-- are not addressed. Similar information should be provided for all the other candidate sites in the respective sections within the Regions of Interest. For example, fruit, vegetable, cattle and dairy production are prominent in Idaho and Washington state in general vicinity of INEEL and Hansford plants, respectively, and South Carolina is a poultry production state. Also, no mention is made of local management districts for groundwater and surface water resources; these include the Panhandle Ground Water Conservation District No. 3, White Deer, which encompasses an 8-county area including Pantex. 9 10

* **Chapter 4, Environmental Consequences**--The forgoing comments for Chapter 3 generally apply to this chapter as well. 11

- **Section 4.6, Alternative 4A**--Indicates that the air quality impacts will be minimal along with waste management, human health , or water resource risks. Increments added by operation of the pit conversion at Pantex will be non-existent or minimal (Table 4-5 vs. Table 4-58), and resultant site concentrations will bc far below EPA or TNRCC ambient air quality standards for most contaminants and below EPA NAAS for PM10 on both an annual and 24-hour averaging time basis. 12

* **Appendix F, Impact Assessment Methods, and Appendix G, Air Quality**--
- Does not include information for any site concerning 13
  - agricultural production practices
  - accidental releases--explosion, fires, spills, etc.
  - dispersion modeling 14
  - areas affected
  - redistribution of particulates from Pantex by water or wind erosion.

* **Appendix I, Socioeconomics**

- Does not include discussion concerning agricultural production, land use, or rural residents including whether or not they could be affected. 15

TXD49

should not impact the soil used for agriculture and farming in adjacent regions. Any impacts to the surrounding areas would be within Federal, State, and local regulatory limits. Based on the analysis in this SPD EIS, there should be no impact on the agricultural lands surrounding the sites from the construction or normal operation of the proposed facilities.

TXD49–9 **Socioeconomics**

This comment is addressed in response TXD49–5.

TXD49–10 **Water Resources**

Section 3.4.7.2.1 reflects that Pantex is in Panhandle Groundwater District 3.

TXD49–11 **Socioeconomics**

This comment is addressed in responses TXD49–5, TXD49–8, and TXD49–10.

TXD49–12 **Air Quality and Noise**

DOE acknowledges the commentor's conclusion that air quality, waste management, human health, and water resource impacts at Pantex for Alternative 4A would likely be minor.

TXD49–13 **Socioeconomics**

Although Appendix F and Appendix G do not specifically address agricultural production practices, the potential impact to human health from the consumption of agricultural products is addressed in Appendixes J.1.1.3, J.2.1.3, J.3.1.3, and J.4.1.3. This analysis includes consideration of potential contamination of agricultural products and livestock, and consumption of these products by persons living within an 80 km (50 mi) radius of each of the candidate sites.

TXD49–14 **Facility Accidents**

Appendix F is actually an overview of accident analysis methods. Detailed development of the consequences of hypothesized accidents can be found in Appendix K and a discussion of dispersion modeling and particulate redistribution is included in Appendix J.

TXD49–15 **Socioeconomics**

Land use at Pantex is discussed in Section 4.26.3.5. It was concluded that because the environmental impacts associated with operating or constructing the proposed surplus plutonium disposition facilities at Pantex would likely be minor, there would be little if any impact on the surrounding land.

The remainder of this comment is addressed in response TXD49–13.

TEXAS A&M UNIVERSITY
JOHN M. SWEETEN
PAGE 5 OF 5

* **Appendix J, Human Health Risks**--
- The agricultural data mentioned (from the 1987 Census of Agriculture) but not shown should be presented for all four sites. This information should be presented in a separate Appendix.
- Other agricultural data sources or more recent vintage than the Census of Agriculture are readily available as well, from entities such as the State Crop and Livestock Statistical Services, the Cooperative Extension Services (eg. Texas Agricultural Extension Service), the USDA-Farm Services Agency, etc.. 16

- Analysis does not appear to take into account Pu doses, transience, or effects on field grain crops, forages, or animals, nor contamination pathways other than direct ingestion. 17

The opportunity to reiew and comment on the SPD EIS document is appreciated. I hopw these remarks are useful in strengthening the document and provide the basis for continuing development of greater scientific information regading the environmental quality for Pantex and other sites in other locations also.

Prepared by: John M. Sweeten, Ph.D., P. E., Professor and Resident Director, Texas Agricultural Experiment Station, Texas A & M University Agricultural Research and Extension Center, Amarillo, TX.

TXD49

TXD49–16 **Socioeconomics**

This SPD EIS is tiered from the *Storage and Disposition PEIS.* The agricultural data used to model radiation doses to the public were based on the 1987 U.S. Census of Agriculture for the four candidate sites. These data are not reprinted in this SPD EIS but were made available to the public as a reference to the *Storage and Disposition PEIS*. The reference cited in the *Storage and Disposition PEIS* is *Health Risk Data for Storage and Disposition of Weapons-Usable Fissile Materials Programmatic Environmental Impact Statement* (HNUS, October 1996).

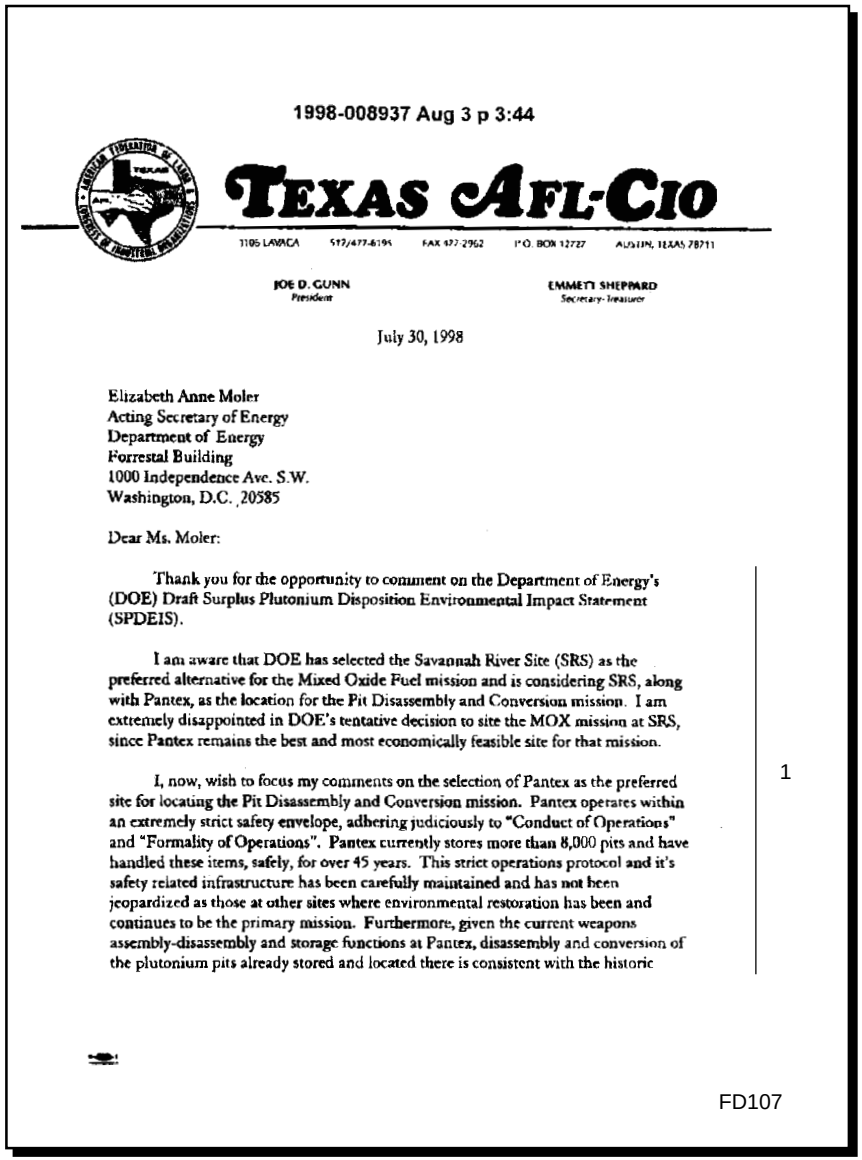
TXD49–17 **Human Health Risk**

DOE acknowledges the commentor's concern that the radiological impact assessments may not take into account doses from plutonium releases; transience considerations; effects on field grain crops, forage, and animals; and contamination pathways other than direct ingestion.

The assessments were performed using the GENII–II computer program, as discussed in Appendix F.10 and expanded on in Appendix J. The source terms in the assessments include the various plutonium isotopes released to the environment. All possible dosage pathways were evaluated: external exposure from finite atmospheric plumes, inhalation, internal exposure from consumption of food and inadvertent intake of soils, and external exposure from contaminated soils. Transience considerations would only marginally affect the results.

It is generally acknowledged that if humans were protected from radiation impacts, other biota would also be protected. Evidence from *Effects of Ionizing Radiation on Plants and Animals at Levels Implied by Current Radiation Protection Standards* (IAEA Technical Report Series 332, 1992) indicates that chronic doses below 0.1 rad/day (36.5 rad/yr) do not harm animals or plant populations. Since doses to humans from all pathways combined would be maintained below 0.1 rem/yr (DOE Order 5400.5), which is less than 0.1 rad/yr, it is highly probable that doses delivered to plants and animals would be less than 0.1 rad/day. Therefore, no radiological damage to plant and animal populations would be expected as the result of surplus plutonium disposition activities.

TEXAS AFL-CIO
JOE D. GUNN ET AL.
PAGE 1 OF 3



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TEXAS AFL-CIO

1106 LAVACA 512/477-6194 FAX 477-2962 P.O. BOX 12727 AUSTIN, TEXAS 78711

JOE D. GUNN
President

EMMETT SHEPPARD
Secretary-Treasurer

July 30, 1998

Elizabeth Anne Moler
Acting Secretary of Energy
Department of Energy
Forrestal Building
1000 Independence Ave. S.W.
Washington, D.C. ,20585

Dear Ms. Moler:

Thank you for the opportunity to comment on the Department of Energy's (DOE) Draft Surplus Plutonium Disposition Environmental Impact Statement (SPDEIS).

I am aware that DOE has selected the Savannah River Site (SRS) as the preferred alternative for the Mixed Oxide Fuel mission and is considering SRS, along with Pantex, as the location for the Pit Disassembly and Conversion mission. I am extremely disappointed in DOE's tentative decision to site the MOX mission at SRS, since Pantex remains the best and most economically feasible site for that mission.

I, now, wish to focus my comments on the selection of Pantex as the preferred site for locating the Pit Disassembly and Conversion mission. Pantex operates within an extremely strict safety envelope, adhering judiciously to "Conduct of Operations" and "Formality of Operations". Pantex currently stores more than 8,000 pits and have handled these items, safely, for over 45 years. This strict operations protocol and it's safety related infrastructure has been carefully maintained and has not been jeopardized as those at other sites where environmental restoration has been and continues to be the primary mission. Furthermore, given the current weapons assembly-disassembly and storage functions at Pantex, disassembly and conversion of the plutonium pits already stored and located there is consistent with the historic

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FD107

FD107–1 **Alternatives**

DOE acknowledges the commentors' support for siting the pit conversion facility at Pantex. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

TEXAS AFL-CIO
JOE D. GUNN ET AL.
PAGE 2 OF 3

mission of the plant. Opponents who are opposed to siting disposition missions at Pantex, (SRS in particular), argue that DOE should not introduce plutonium missions at a site where the work could be considered "new" at the location. This argument is false and disingenuous because Plutonium work at Pantx has, is currently and will, in the future, be performed in the areas of Radiation Safety Contingencies, Waste Operations, and Pit Reuse. SRS, itself, is already sited for a "new" type of work - tritium production via an accelerator. If their argument is valid, then DOE has no alternative but to place the tritium mission elsewhere.

Pantex has a well-trained and qualified Union Workforce which is second to none in the nation. This Union Workforce is staffed by three full-time Metal Trades Council Union Safety Officers. No other plant in the nation has anything comparable to this program and it provides the crucial and necessary check and balance if DOE intends to follow former Secretary Pena's Memo on Environment, Safety and Health of April 14, 1998. This Union Safety Officer Program at Pantex has also been called a model for the entire DOE Complex by former Secretary of Energy Federico Pena. The Workforce actively participates in such endeavors as the Voluntary Protection Program, Integrated Safety Management, Seamless Safety-21 Program, and Enhanced Work Planning. Pantex's World Class Security Force, consistently ranked number one in the DOE complex, has, again, won the Secretary's Trophy as the Top Security Force in DOE. These accomplishments by the Pantex workforce do not sound as if they are a bunch of "amateurs" to me as they have been described by members of the South Carolina delegation. When considering the proliferation risks involved in unnecessarily transporting a large number of classified plutonium pits across the country from Pantex, it makes budgetary and policy sense to site disposition missions where storage already exists and is taking place. Pantex is clearly the most cost-effective site over the life of the program than any other site under consideration. Pantex has the necessary safety culture, security and surveillance capabilities to accommodate this expanded role.

1

FD107

Page -3-
Elizabeth Anne Moler
Acting Sec. of Energy

Based upon these reasons, I respectfully urge DOE to designate Pantex as the site for the Pit Disassembly and Conversion Facility. Thank you, in advance, for your consideration. 1

Yours truly,

Joe D. Gunn
President

Emmett Sheppard
Secretary-Treasurer

JDG/ES/vc
opeiu298/afl-cio

cc: The Hon. John Sharp, Texas State Comptroller
The Hon. Al Gore, Vice-President
Frank George, Metal Trades Council of Amarillo

FD107

TEXAS BUILDING AND CONSTRUCTION TRADES COUNCIL
GALE VAN HOY
PAGE 1 OF 2

Thank you for the opportunity to comment on the Department of Energy's actions regarding the location for the disassembly/conversion mission.

The Texas Building and Construction Trades Council is aware that D.O.E. has selected the Savannah River Site as the preferred alternative for the MOX fuel fabrication facility and is considering SRS, along with Pantex, as the location for the disassembly/ conversion mission. We are very disappointed that the DOE decided to locate the MOX facility at SRS, since Pantex remains the best, cleanest, and cheapest site for that mission, and not coincidentally that it is a unionized plant.

Precisely because the Pantex plant has unionized, and therefore highly trained workforce, we are concerned that locating the plutonium pit disassembly and conversion mission at a site other than Pantex would not only increase the hazards of dealing with but would also ignore the facts that make Pantex the site most capable of ensuring that disposition goals are met with the utmost attention to economic and safety considerations. 1

Pantex is already uniquely suited to assume this new function, in spite of comments from some South Carolina politicians. Pantex currently safehouses

TXD41

TXD41–1 **Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion and MOX facilities at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses (including analyses of transportation risks), technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

more than 8,000 surplus pits and has a long history of handling pits and related infrastructure in a highly professional fashion that has as its highest goal an excellent safety culture. Furthermore, given the current weapons disassembly and storage functions at Pantex, disassembly and conversion of the pits already located here is consistent with the historic mission of Pantex.

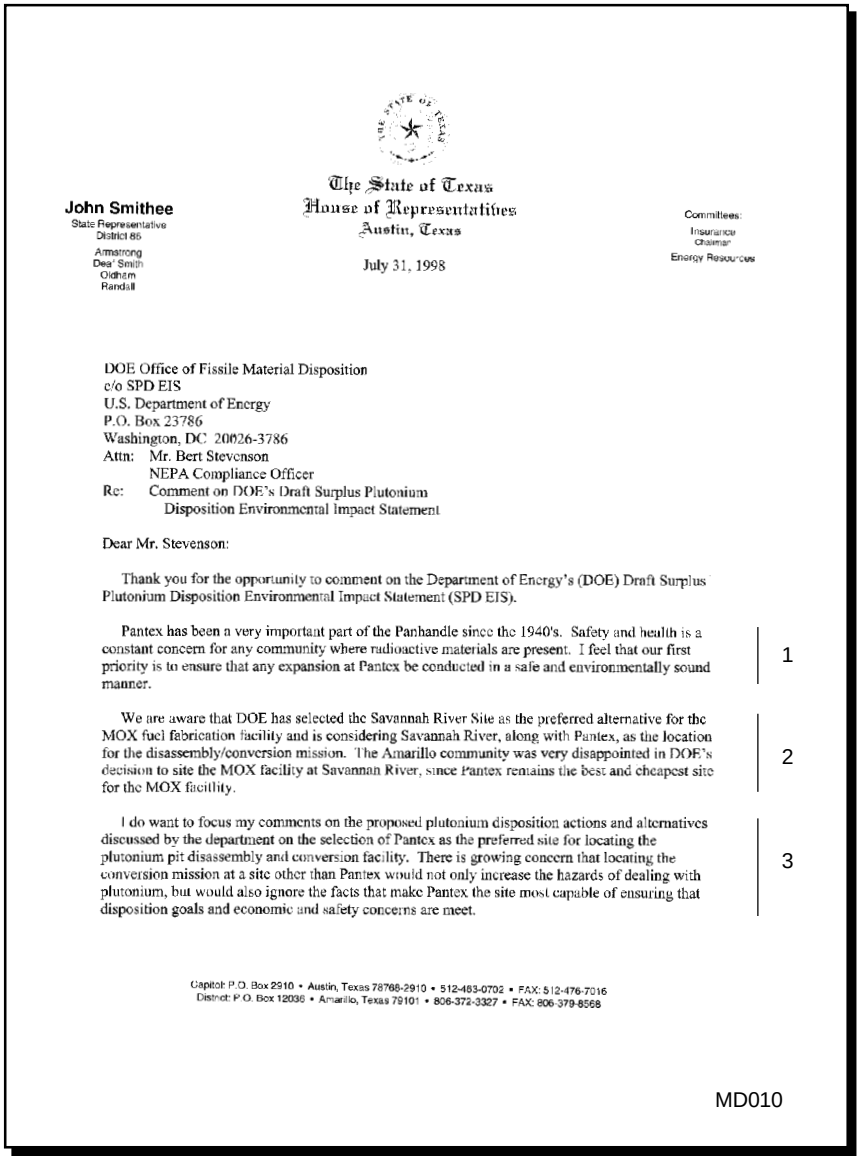
Pantex is ready to go Day One, with a well-trained, unionized workforce—hardly the group of "amateurs" as they have been described.

We believe the Pantex site is best for the above reasons and when one considers the risk factors of moving live weapons clear across the country, we believe that the logical conclusion is that it's cheaper, safer and easier to track converted plutonium pits for IAEA and international inspections at the site of original pit storage. 1

Based upon these reasons, I, as Secretary-Treasurer of the Texas Building and Construction Trades Council, respectfully urge D.O.E. to designate Pantex as the site for the pit disassembly and conversion facility. Thank you for the opportunity to comment of this decision-making process.

TXD41

TEXAS HOUSE OF REPRESENTATIVES
HONORABLE JOHN SMITHEE
PAGE 1 OF 2



The State of Texas
House of Representatives
Austin, Texas

John Smithee
State Representative
District 86

Armstrong
Deaf Smith
Oldham
Randall

Committees:
Insurance
Chairman
Energy Resources

July 31, 1998

DOE Office of Fissile Material Disposition
c/o SPD EIS
U.S. Department of Energy
P.O. Box 23786
Washington, DC 20026-3786
Attn: Mr. Bert Stevenson
NEPA Compliance Officer
Re: Comment on DOE's Draft Surplus Plutonium
Disposition Environmental Impact Statement

Dear Mr. Stevenson:

Thank you for the opportunity to comment on the Department of Energy's (DOE) Draft Surplus Plutonium Disposition Environmental Impact Statement (SPD EIS).

Pantex has been a very important part of the Panhandle since the 1940's. Safety and health is a constant concern for any community where radioactive materials are present. I feel that our first priority is to ensure that any expansion at Pantex be conducted in a safe and environmentally sound manner. 1

We are aware that DOE has selected the Savannah River Site as the preferred alternative for the MOX fuel fabrication facility and is considering Savannah River, along with Pantex, as the location for the disassembly/conversion mission. The Amarillo community was very disappointed in DOE's decision to site the MOX facility at Savannah River, since Pantex remains the best and cheapest site for the MOX facility. 2

I do want to focus my comments on the proposed plutonium disposition actions and alternatives discussed by the department on the selection of Pantex as the preferred site for locating the plutonium pit disassembly and conversion facility. There is growing concern that locating the conversion mission at a site other than Pantex would not only increase the hazards of dealing with plutonium, but would also ignore the facts that make Pantex the site most capable of ensuring that disposition goals and economic and safety concerns are meet. 3

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District: P.O. Box 12036 • Amarillo, Texas 79101 • 806-372-3327 • FAX: 806-379-8568

MD010

MD010–1 **DOE Policy**

DOE has and will continue to make health, safety, and environmental issues a matter of utmost importance in the planning and conduct of all nuclear operations, including the disposition of surplus plutonium. This SPD EIS shows that the impact of properly implementing the proposed action at Pantex would have no major effect on the health, safety, and environment in the Amarillo area.

MD010–2 **Alternatives**

DOE acknowledges the Representative's support for siting the MOX facility at Pantex. As indicated in Section 1.6, SRS is preferred for the MOX facility because this activity complements existing missions and takes advantage of existing infrastructure and staff expertise.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. Because cost issues are beyond the scope of this EIS, this comment has been forwarded to the cost analysis team for response. The cost report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at http://www.doe-md.com and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS and Washington, D.C.

MD010–3 **Alternatives**

DOE acknowledges the Representative's support for siting the pit conversion facility at Pantex. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses (including analyses of transportation risks), technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

page 2
State Representative John Smithee
Mr. Bert Stevenson
Department of Energy

Pantex has played a major role in our national defense needs. It is uniquely suited for this new function. The taxpayers have already paid for more than 8,000 surplus pits and trained qualified employees to handle pits and the related infrastructure with and operational protocol that is the mainstay of an excellent safety culture.

There are numerous other matters such as proliferation risk, and the transportation of plutonium that I am not qualified to discuss, but, are very important issue that must be dealt with. I feel that if these matters are addressed with regard to safety, cost, and what is best for the nation, Pantex, is the best site for the disassembly and conversion mission. 3

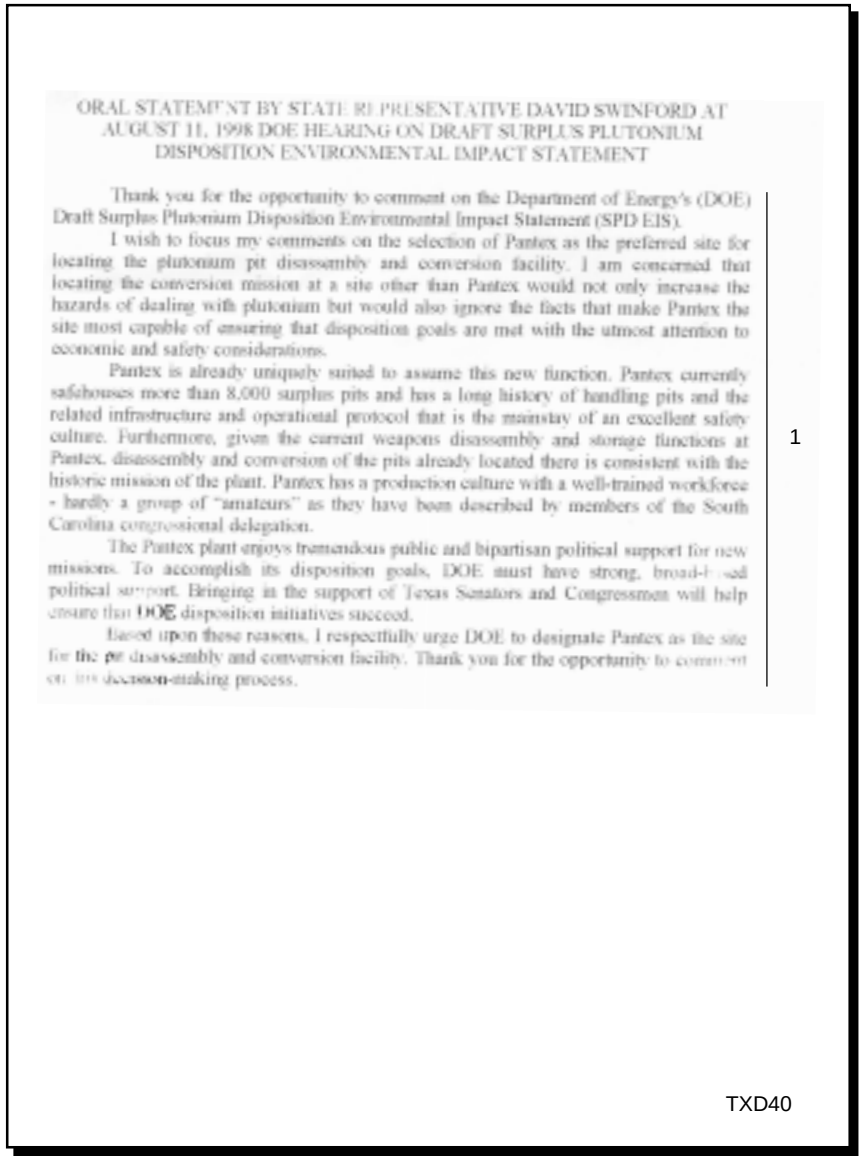
Again, I want to thank the department for allowing me to voice my concerns and views on this matter, and would respectfully urge DOE to designate Pantex as the site for the pit disassembly and conversion facility. '

Yours very truly,

John Smithee

MD010

TEXAS HOUSE OF REPRESENTATIVES
HONORABLE DAVID SWINFORD
PAGE 1 OF 1



ORAL STATEMENT BY STATE REPRESENTATIVE DAVID SWINFORD AT AUGUST 11, 1998 DOE HEARING ON DRAFT SURPLUS PLUTONIUM DISPOSITION ENVIRONMENTAL IMPACT STATEMENT

Thank you for the opportunity to comment on the Department of Energy's (DOE) Draft Surplus Plutonium Disposition Environmental Impact Statement (SPD EIS).

I wish to focus my comments on the selection of Pantex as the preferred site for locating the plutonium pit disassembly and conversion facility. I am concerned that locating the conversion mission at a site other than Pantex would not only increase the hazards of dealing with plutonium but would also ignore the facts that make Pantex the site most capable of ensuring that disposition goals are met with the utmost attention to economic and safety considerations.

Pantex is already uniquely suited to assume this new function. Pantex currently safehouses more than 8,000 surplus pits and has a long history of handling pits and the related infrastructure and operational protocol that is the mainstay of an excellent safety culture. Furthermore, given the current weapons disassembly and storage functions at Pantex, disassembly and conversion of the pits already located there is consistent with the historic mission of the plant. Pantex has a production culture with a well-trained workforce - hardly a group of "amateurs" as they have been described by members of the South Carolina congressional delegation.

The Pantex plant enjoys tremendous public and bipartisan political support for new missions. To accomplish its disposition goals, DOE must have strong, broad-based political support. Bringing in the support of Texas Senators and Congressmen will help ensure that DOE disposition initiatives succeed.

Based upon these reasons, I respectfully urge DOE to designate Pantex as the site for the pit disassembly and conversion facility. Thank you for the opportunity to comment on this decision-making process.

1

TXD40

TXD40–1 **Alternatives**

DOE acknowledges the Representative's support for siting the proposed pit conversion facility at Pantex, as well as the observations regarding broad political and community support. Decisions on the surplus plutonium disposition program at Pantex will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

surplus plutonium by meeting the Spent Fuel Standard. The Spent Fuel Standard, as identified by NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors.

This SPD EIS analyzes the potential environmental impacts associated with implementing the proposed activities at the candidate sites. The results of these analyses, presented in Chapter 4 of Volume I and summarized in Section 2.18, demonstrate that the activities would likely have minor impacts at any of those sites, including Pantex. Incident-free (normal) releases of radioactivity from the proposed surplus plutonium disposition facilities to the food production chain are explained for each site in Appendix J. Current and future operations at the candidate sites should not impact the soil used for agriculture and farming in any of the regions adjacent to these sites.